



California Building
Industry Association

1215 K Street
Suite 1200
Sacramento, CA 95814
916/443-7933
fax 916/443-1960
www.cbia.org

2008 OFFICERS

Chairman
RAYMOND C. BECKER
DMB
El Rancho San Benito
Hollister

Vice Chairman
HORACE HOGAN II
Brehm Communities
Carlsbad

CFO/Secretary
JOHN R. YOUNG
Young Homes
Rancho Cucamonga

President & CEO
ROBERT RIVINIUS, CAE
Sacramento

**MEMBER
ASSOCIATIONS**

Building Industry
Association of
Central California
Modesto

Building Industry
Association of the Delta
Stockton

Building Industry
Association of
Fresno/Madera Counties
Fresno

Building Industry
Association of
San Diego County
San Diego

Building Industry
Association of
Southern California
Diamond Bar

Home Builders
Association of
Central Coast
San Luis Obispo

Home Builders
Association of
Kern County
Bakersfield

Home Builders
Association of
Northern California
San Ramon

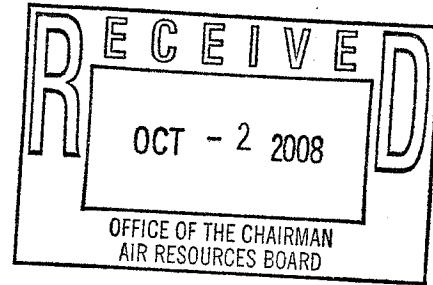
Home Builders
Association of
Tulare & Kings Counties
Visalia

North State Building
Industry Association
Sacramento

CO-10-8

October 2, 2008

Honorable Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95812



Dear Madam Chair:

Recently published reports indicate that the soon to be released AB 32 Scoping Plan will contain a significantly increased projection for greenhouse gas (GHG) reductions for the land-use sector. Given discussions with you regarding this matter – and the recent enactment of SB 375 – if true, this is a very disturbing development and would be strongly opposed by California homebuilders, represented by the California Building Industry Association (CBIA) and the California Major Builders Council (CMBC).

As you recall, during a meeting with CMBC in August, you said that absent significant scientific proof there was no justification for increasing or decreasing the 2020 GHG emission-reduction projection of 2.1 million metric tons. Since no such evidence has been presented, CBIA and CMBC believe that any plans for an increase ought to be dismissed and attention should instead be focused on implementing the rigorous process outlined in SB 375, which is now law, and accomplishing your stated goal of making the land-use elements of AB 32 work.

California homebuilders are extremely proud of their work to put SB 375 in front of the Governor and to get his signature. Following that success with a dispute with CARB over a baseless increase in the target for land-use-based GHG emission reductions would be unproductive and would serve to resume a more confrontational approach to dealing with the matters supporting the state's goals for combating global warming – an approach that the work of divergent interests on SB 375 sought to overcome.

California homebuilders hope the reports about the subject increase in the GHG emission targets for land use are baseless. If true, however, CBIA and CMBC request that you reconsider such a change before presenting adequate and conclusive scientific evidence to support it and, at a minimum, discuss with California homebuilders and other stakeholders the reasons for making such a precipitous change even before the ink is dry on SB 375 and the workability of the Scoping Plan is determined.

Very sincerely yours,

Timothy L. Coyle
California Building Industry Association

Ed Manning
California Major Builders Council

cc: Linda Adams, Secretary, Cal-EPA
James Goldstene, Executive Officer, CARB
Susan Kennedy, Chief of Staff, Governor Arnold Schwarzenegger
Victoria Bradshaw, Cabinet Secretary, Governor Arnold Schwarzenegger
Lynn Terry, Deputy Executive Officer, CARB